



**Division of Academic and Technical Education
Office of Vocational and Adult Education**

**FY 2011 Monitoring Plan for
State Formula and Discretionary Grants
Funded under Title I and II of the
Carl D. Perkins
Career and Technical Education Act of 2006
(Perkins IV)**

Final Approved Version: January 2011

CONTENTS

Executive Summary	3
I. Background on Perkins IV Grants	4
II. Purpose and Topical Areas for Monitoring	6
III. Monitoring Strategy	6
IV. States Selected for Monitoring in FY 2011	7
V. Monitoring Evaluation.....	7
VI. Conclusion	8
Attachments:	
A: FY 2011 Perkins Monitoring Schedule	9

Executive Summary

The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) is the principal source of federal funds for the improvement of secondary and postsecondary career and technical education programs across the nation. Its purpose is to develop more fully the academic, career, and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs.

Congress has appropriated, in each year since passage of the legislation, more than \$1.2 billion in Perkins formula grants to States,¹ including the basic State grants (Title I) and tech-prep grants (Title II), and another \$32 million in Perkins discretionary grants under the Native American Career and Technical Education Program (NACTEP), Native Hawaiian Career and Technical Education Program (NHCTEP), and Tribally-Controlled Postsecondary Career and Technical Institutions Program (TCPCTIP). Congress has also appropriated roughly \$7.8 million in national activities, a portion of which (approximately \$1.5 million annually) has been used to fund discretionary grantees under a Rigorous Programs of Study (RPOS) initiative.

The Office of Vocational and Adult Education's (OVAE) Division of Academic and Technical Education (DATE)—the unit that oversees the administration, implementation, and accountability of the Perkins grants—implements an annual monitoring plan for State formula and discretionary grants funded under the law. The overarching purpose of DATE's monitoring plan is three-fold: (1) upholding the Department's fiduciary responsibility in protecting against waste, fraud, and abuse of Federal funds; (2) ensuring that grantees effectively comply with the requirements of the law; and, (3) providing technical assistance to help grantees offer effective career and technical education programs consistent with the law.

States and discretionary grantees under NACTEP, NHCTEP, and TCPCTIP are selected for monitoring each year based on a combination of risk factors, including grant award size, performance results, data quality, audit findings, and grant award conditions. Grantees are then scheduled for full or targeted visits based on their level of risk. Full visits are week long, on-site reviews that address compliance with respect to seven topical areas: State or program administration, fiscal program responsibility, local applications, accountability, tech-prep programs, programs of study, and special populations. Targeted visits are two-day, on-site reviews that address one or more of the above topical areas depending on the issues and needs of the State or grantee. RPOS grantees are selected for monitoring based on their need for programmatic guidance and technical assistance in implementing their grant awards.

For FY 2011, the following grantees have been selected for monitoring visits:

- Five State formula grantees: Arizona, Massachusetts, Wisconsin, Indiana, and the Virgin Islands.
- Two NACTEP discretionary grantees: Owens Valley Community College and Hoopa Valley Education Association (both located in California).

¹ States include the District of Columbia, Puerto Rico, Guam, Palau, and the Virgin Islands.

- Each of the six RPOS grantees: Arizona, Kansas, Maryland, Montana, Utah, and Wisconsin.

This plan, which fully describes the DATE monitoring process, is organized into seven sections. Section I briefly describes the purpose, objectives, and goals of the Perkins grants. Sections II-V outline the monitoring process from initial identification of States and grantees for monitoring to final closeout of monitoring findings. Section VI describes the annual evaluation of DATE's monitoring efforts. Section VII provides closing comments.

As Perkins IV continues to be implemented across the nation, DATE is pleased to report its progress in monitoring States' and discretionary grantees' compliance with the legislation and in providing technical assistance to help States and discretionary grantees to improve their Perkins V administration, implementation, and accountability systems. The DATE monitoring efforts fulfill the purpose that Congress envisioned for the legislation—developing more fully the academic, career, and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs.

I. Background on Perkins IV Grants

The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) is the principal source of federal funding to States and discretionary grantees for the improvement of secondary and postsecondary career and technical education programs across the nation. Its purpose is to develop more fully the academic, career, and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs by:

- Building on the efforts of States and localities to develop challenging academic standards and to assist students in meeting such standards, including preparation for high skill, high wage, or high demand occupations in current or emerging professions;
- Promoting the development of services and activities that integrate rigorous and challenging academic and career technical instruction, and that link secondary and postsecondary education for participating career and technical education students;
- Increasing State and local flexibility in providing services and activities designed to develop, implement, and improve career and technical education, including tech-prep education;
- Conducting and disseminating national research and disseminating information on best practices that improve career and technical education programs, services, and activities;
- Providing technical assistance that: a) promotes leadership, initial preparation, and professional development; and b) improves the quality of career and technical education teachers, faculty, administrators, and counselors;

- Supporting partnerships among secondary schools, postsecondary institutions, baccalaureate degree granting institutions, area career and technical education schools and intermediaries; and
- Providing individuals with opportunities throughout their lifetimes to develop, in conjunction with other education and training programs, the knowledge and skills needed to keep the United States competitive.

Congress has appropriated, in each year since passage of the legislation, more than \$1.2 billion in Perkins formula grants to States,² including the basic State grants (Title I) and tech-prep grants (Title II), and another \$32 million in Perkins discretionary grants under the Native American Career and Technical Education Program (NACTEP), Native Hawaiian Career and Technical Education Program (NHCTEP), and Tribally-Controlled Postsecondary Career and Technical Institutions Program (TCPCTIP). Congress has also appropriated roughly \$7.8 million in national activities, a portion of which (approximately \$1.5 million annually) has been used to fund discretionary grantees under a Rigorous Programs of Study (RPOS) initiative.

Title I funds are awarded to States based on population factors specified in law. States then determine what share of Perkins IV formula funds will be allocated to secondary and postsecondary institutions in their States and distribute up to 85 percent of those funds to eligible recipients based on a combination of population and poverty factors described in law. Eligible recipients include local educational agencies, area career and technical schools, community colleges, and other public or private nonprofit institutions, including charter schools, that offer career and technical education programs that meet the requirements of the law. The remainder of Title I funds are spent on State administration activities (up to five percent) and State leadership activities (up to ten percent) described in sections 121(a) and 124(b)-(c) of Perkins IV, respectively.

Title II funds also are awarded to States based on population factors specified in law. States distribute these funds via formula or competitive process to eligible consortia comprising local educational agencies (LEAs) and institutions of higher education. Local consortia may spend tech prep funds to accomplish the purposes outlined in sections 203(c)-(d) of Perkins IV. The remainder of the Title II funds are spent on State administration activities (typically up to five percent as “necessary and reasonable,” per the ED Department’s non-regulatory guidance). A new provision under section 202 of Perkins IV allows a State to consolidate all or a portion of its Title II funds with its Title I funds and to spend those consolidated funds for purposes under Title I of the law. As of FY 2011, 26 States opted to consolidate all or a portion of their Title II funds.

Discretionary grants to NACTEP, NHCTEP, and TCPCTIP grantees are awarded through a competitive grant process. A notice is posted in the Federal Register inviting applicants to apply for the grant funds, provided they meet certain criteria established in accordance with the Perkins legislation. The amount of funds awarded to grantees is determined by applicants’ budget requests and the amount of available federal funds. Grantees spend their funds for a wide range of activities described in section 116 (NACTEP and NHCTEP) and section 117 (TCPCTIP) of

² States include the District of Columbia, Puerto Rico, Guam, Palau, and the Virgin Islands.

Perkins IV. NACTEP and TCPCTIP grantees are funded for up to a five year period; NHCTEP grantees are funded for up to a three-year period.

National activities funds support additional discretionary grantees. In FY 2010, six states were awarded grants through a competitive grant process under the Promoting Rigorous Programs of Study (RPOS) Project. These grantees will promote and improve State and local development, implementation, and assessment of the impact of student participation in career and technical education programs of study that link secondary and postsecondary education combine academic and career and technical education in a structured sequence of courses; offer students opportunities to earn postsecondary credits for courses taken in high school; and that lead to a postsecondary credential, certificate, or degree as outlined in OVAE's Programs of Study Design Framework. RPOS grantees are funded for up to a four-year period. (This sentence is too long—I put in semi-colons to break it up—you may want to determine if you want them to remain or if it is best to restructure the sentence—I think it is fine with the semi-colons.)

II. Purpose and Topical Areas for Monitoring

The Office of Vocational and Adult Education's (OVAE) Division of Academic and Technical Education (DATE)—the Department's unit that oversees the Perkins grants—implements an annual monitoring plan for State formula and discretionary grants funded under the law. The overarching purpose of DATE's monitoring plan is three-fold: (1) upholding the Department's fiduciary responsibility in protecting against waste, fraud, and abuse of Federal funds; (2) ensuring that grantees effectively comply with the requirements of the law; and, (3) providing technical assistance to help grantees offer effective career and technical education programs consistent with the law.

To meet this purpose, DATE reviews States formula grants for compliance in up to seven key areas that have been identified as central to the effective implementation of Perkins IV: State administration, fiscal responsibility, local applications, tech prep programs (if the state has not consolidated its funds), programs of study, accountability, and special populations. Discretionary grantees are reviewed for adherence to the goals, objectives, budgets, and deliverables outlined in their approved applications for funding.

III. Monitoring Strategy

States and grantees under NACTEP, NHCTEP, and TCPCTIP are selected each year for monitoring based on a combination of risk factors, namely:

- Last time monitored.
- Questioned costs in A-133 single State audits for the two prior fiscal years.
- Failure to draw down available grant funds in regular or reasonable intervals.
- Conditions placed on the most recent grant award for failure to submit complete performance data and/or meet data quality standards.
- Failure to meet agreed-upon performance levels for all students and/or disaggregated student populations.

RPOS grantees are selected for monitoring based on their need for programmatic guidance and technical assistance in implementing their grant awards.

States and discretionary grantees are then scheduled for full or targeted visits. Full visits are week long, on-site reviews that address compliance with respect to the seven topical areas noted in section II above. Targeted visits are two-day, on-site reviews that address one or more of the above topical areas, depending on the issues and needs of the State or grantee.

Prior to each monitoring visit, DATE staff hosts a pre-briefing with OVAE leadership to discuss the State and/or grantee risk factors and the planned agenda for the visit. During each visit, DATE staff review documentation and interview key staff pursuant to a prescribed set of checklist items (for State formula grantees) or interview protocols (for discretionary grantees). Following each visit, DATE hosts a post-briefing for the Assistant Secretary and other OVAE leadership to share key findings and suggested improvement strategies that will be included in the final monitoring report for the State or grantee.

Within sixty days after the visit, a formal monitoring report is issued to the State or grantee indicating areas of non-compliance (findings) and corrective actions as well as suggested improvement strategies. Any State or grantee having findings must submit corrective actions to DATE within the timeframe established in the report or otherwise negotiated with DATE staff. The DATE staff coordinates extensive follow-up with the State to ensure that all corrective actions are addressed and closed in a timely fashion. A letter is issued to the State or grantee to officially close out the monitoring report once all corrective actions have been satisfied.

IV. States Selected for Monitoring in FY 2011

The following grantees have been selected for monitoring visits in FY 2011:

- Five State formula grantees: Arizona, Massachusetts, Wisconsin, Indiana, and the Virgin Islands
- Two NACTEP discretionary grantees: Owens Valley Community College and Hoopa Valley Education Association (both located in California)
- Each of the six RPOS grantees: Arizona, Kansas, Maryland, Montana, Utah, and Wisconsin

V. Monitoring Evaluation

The DATE staff conducted a formal evaluation of its Perkins State formula grant monitoring process over the past three years. This process has provided States with an opportunity to rate various aspects of the on-site and follow-up monitoring processes as well as to offer suggestions for improvement. States rated the following elements:

- The length, format, and content of the visit.
- The format and content of the follow-up report.
- The extent to which the State has implemented the corrective actions and/or suggested improvement strategies identified in the follow-up report.

- The extent to which the visit helped the State to improve their Perkins State administration, implementation, and accountability efforts.

Evaluation outcomes were overwhelmingly positive. States reported that monitoring visits contributed to substantial improvements in State and local level implementation of Perkins IV, particularly as it relates to administration of career and technical education and enhancing performance and accountability systems. (Ed, the original format of this sentence was not clear—I've tried to clear it up, but you by wish to doctor it up a bit more as it pertains to what exactly was substantially improved...)

VII. Conclusion

The DATE is pleased to report its FY 2011 plans to monitor its State formula and discretionary grantees pursuant to Perkins IV. Through implementation of this plan, DATE continues to carry out the Department's fiduciary responsibilities as well as fulfill the purpose that Congress envisioned for the legislation—developing more fully the academic, career, and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs.

FY 2011 PERKINS MONITORING SCHEDULE

State or Grantee	Type of Grant and Visit	Dates	Monitoring Team Members (* Indicates Lead Member)
Massachusetts	State Formula Grant - Full	February 14-18, 2011	Len Lintner* – State Administration; Local Applications Marilyn Fountain - Tech Prep Programs; Special Populations Andy Johnson – Fiscal Responsibility Sharon Head – Accountability and Special Populations Gisela Harkin – Programs of Study
Maryland	RPOS Grant – Targeted	February 2011	Libby Livings-Eassa* and other staff TBD
Wisconsin	RPOS Grant – Targeted	February 24-25, 2011	Libby Livings-Eassa* and other staff TBD
Kansas	RPOS Grant – Targeted	March 9-10, 2011	Libby Livings-Eassa* and other staff TBD
Arizona	State Formula Grant – Full; RPOS Grant – Targeted	April 25-29, 2011	Allison Hill* – State Administration; Tech Prep Andy Johnson – Fiscal Responsibility Len Lintner – Local Applications Jose Figueroa – Accountability and Special Populations Libby Livings-Eassa – Programs of Study
Montana	RPOS Grant – Targeted	March 4-5, 2011	Libby Livings-Eassa* and other staff TBD
Utah	RPOS Grant – Targeted	March 2-3, 2011	Libby Livings-Eassa* and other staff TBD
Indiana	State Formula Grant - Full	April 2011	Marilyn Fountain* – State Administration; Tech Prep Andy Johnson – Fiscal Responsibility Len Lintner – Local Applications Jose Figueroa – Accountability and Special Populations TBD – Programs of Study
Owens Valley CDC (California)	NACTEP Grant - Targeted	April 2011	Gwen Washington*; Linda Mayo
Hoop Valley Education Association (California)	NACTEP Grant - Targeted	April 2011	Linda Mayo*; Gwen Washington

State or Grantee	Type of Grant and Visit	Dates	Monitoring Team Members (* Indicates Lead Member)
Wisconsin	State Formula Grant – Full	May 16-20, 2011	Marilyn Fountain* – State Administration; Tech Prep Andy Johnson – Fiscal Responsibility Len Lintner – Local Applications Marie Buker – Accountability and Special Populations Libby Livings-Eassa – Programs of Study
Virgin Islands	State Formula Grant – Full	July 2011	Staff TBD